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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FRANCISCA RODRIGUEZ VILLA

Plaintiff,

v.

KRISTI NOEM,<sup>1</sup> Secretary of the United States  
Department of Homeland Security, *et al.*,

Defendants.

Case No. 3:25-cv-00818 TSH

**STIPULATION TO STAY PROCEEDINGS;  
[PROPOSED] ORDER**

The parties apologize to the Court for not submitting a response by April 28, 2025, due to their need to confer regarding a potential resolution of this case. The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until July 9, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

1. Plaintiff filed this mandamus action seeking adjudication of her Form I-589, Application for Asylum and Withholding of Removal. United States Citizenship and Immigration Services (“USCIS”) scheduled an interview for June 9, 2025. USCIS will work diligently towards completing

<sup>1</sup> Kristi Noem is automatically substituted as the defendant in this matter in accordance with Federal Rule of Civil Procedure 25(d).

1 adjudication of the I-589 application, absent the need for further adjudicative action or unforeseen  
2 circumstances that would require additional time for adjudication.

3 2. Plaintiff agrees to submit all supplemental documents and evidence to USCIS seven to  
4 ten days prior to the agreed upon scheduled interview. Plaintiff agrees that failure to timely submit this  
5 evidence may result in the rescheduling of the interview at no fault of USCIS.

6 3. If needed by Plaintiff or his dependent(s), Plaintiff shall bring her own interpreter to her  
7 asylum interview. See [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)  
8 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to her  
9 interview may result in the interview being rescheduled at no fault of USCIS.

10 4. Upon receipt of the Asylum Office's decision, Plaintiff agrees to voluntarily dismiss the  
11 case.

12 5. The parties agree to bear their own litigation costs and attorney fees.

13 Accordingly, the parties stipulate and request that the proceedings in this case be stayed until  
14 July 9, 2025, at which time the parties will file a joint status report with the Court. At that time, the  
15 parties may request a further continuance of the stay of proceedings, dismissal of the litigation if  
16 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this  
17 case will benefit the parties and conserve the Court's resources while the parties pursue a potential  
18 administrative resolution.

19 Dated: April 30, 2025

Respectfully submitted,<sup>2</sup>

20 PATRICK D. ROBBINS  
21 Acting United States Attorney

22 /s/ Elizabeth D. Kurlan  
23 ELIZABETH D. KURLAN  
24 Assistant United States Attorney  
25 Attorneys for Defendants

26  
27 <sup>2</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.

1 Dated: April 30, 2025

2 /s/ Michael S. Martin  
3 MICHAEL S. MARTIN  
4 Attorney for Plaintiff

5  
6  
7 **[PROPOSED] ORDER**

8 Pursuant to stipulation, IT IS SO ORDERED.

9 Date: May 1, 2025

10   
11 THOMAS S. HIXSON  
12 United States Magistrate Judge